UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	PROMESA Title III
as representative of	No. 17 BK 3283-LTS
THE COMMONWEALTH OF PUERTO RICO, et al.,	(Jointly Administered

Debtors.¹

(Jointly Administered)

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NOTICE OF <u>AMENDED</u> AGENDA² OF MATTERS SCHEDULED FOR THE HEARING ON JUNE 16-17, 2021 AT 9:30 A.M. AST

Time and Date of Hearing:

Wednesday, June 16, 2021, from 9:30 a.m. to 11:50 a.m., from 1:00 p.m. to 5:00 p.m. and, if necessary,

Thursday, June 17, 2021, from 9:30 a.m. to 1:00 p.m., and from 2:00 p.m. to 5:00 p.m. (Atlantic Standard Time)

Honorable Laura Taylor Swain, United States District Judge Honorable Judith G. Dein, United States Magistrate Judge

Location of Hearing: The Hearing will be conducted telephonically via CourtSolutions.

numbers are listed as Bankruptcy Case numbers due to software limitations).

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case

This amended agenda is being filed, pursuant to the *Order Adjourning Cobra Acquisitions LLC's Motion to Lift Stay Order* [Case No. 17-3283, ECF No. 16970; Case No. 17-4780, ECF No. 2520], to note the adjournment of item III.4 of this agenda, *Cobra Acquisitions LLC's Motion to Lift the Stay Order* [Case No. 17-3283, ECF No. 16328; Case No. 17-4780, ECF No. 2428], subsequent to the filing of the original agenda. A redline comparing this amende d agenda to the original agenda filed at Case No. 17-3283, ECF No. 16968 is attached hereto as Exhibit B.

Attorney Participation: Pursuant to the *Order Regarding Procedures for June 16-17, 2021, Omnibus Hearing* [Case No. 17-3283, ECF No. 16898], attached to this Agenda as **Exhibit A** (the "Procedures Order"), attorneys who have entered an appearance in the Title III cases and wish to participate as speakers or listen in on the proceedings must register with CourtSolutions at www.court-solutions.com. The FOMB and AAFAF may each register up to five speaking lines per day, and all other parties shall be limited to two speaking lines per day. There will be no limitation on listen-only lines.

Members of the Public and Press: Members of the public and press may listen in on the proceedings on a listen-only line by dialing (888) 363-4749 and entering the access code (7214978) and security code (7463) when prompted.

Copies of Documents:

Copies of all documents filed in these Title III cases are available free of charge (a) by visiting https://cases.primeclerk.com/puertorico or by calling +1 (844) 822-9231, and (b) on the Court's website at http://www.prd.uscourts.gov, subject to the procedures and fees set forth therein.

I. STATUS REPORTS:

1. Report from the Oversight Board.

<u>Description</u>: Pursuant to the Procedures Orders, the Financial Oversight and Management Board for Puerto Rico (the "<u>FOMB</u>" or "<u>Oversight Board</u>") will file a written Status Report prior to the hearing. The FOMB will report on (i) the general status and activities of the Oversight Board, including measures taken in response to the COVID-19 pandemic, (ii) the general status of relations among the Oversight Board and the Commonwealth and federal governments, (iii) the general status of work toward substantially consensual plans of adjustment, and (iv) the general status of the ADR and ACR processes, including the anticipated number of matters to be directed into the ADR process and anticipated timetable for initiation of ADR procedures with respect to such matters.

<u>Speakers</u>: Should the Court have questions or comments regarding the FOMB's Status Report, the names of counsel who intend to speak on the Status Report are Martin J. Bienenstock and Brian S. Rosen.

2. Report from AAFAF.

<u>Description</u>: Pursuant to the Procedures Orders, the Puerto Rico Fiscal Agency and Financial Advisory Authority ("<u>AAFAF</u>") will file a written Status Report prior to the hearing. AAFAF will provide a general status report on its status and activities, including an overview of the Commonwealth's ongoing response to the COVID-19 pandemic.

<u>Speakers</u>: Should the Court have questions or comments regarding AAFAF's Status Report, the name of counsel who intends to speak on the Status Report is Luis C. Marini-Biaggi.

II. CONTESTED MATTERS

1. Cobra Acquisitions LLC's Motion to Lift Stay Order. Cobra Acquisitions LLC's Motion to Lift the Stay Order [Case No. 17-3283, ECF No. 16328; Case No. 17-4780, ECF No. 2428]

<u>Description</u>: Motion of Cobra Acquisitions LLC for entry of an order lifting stay applicable to Cobra's Motion for Allowance and Payment of Administrative Expense Claims.

Objection Deadline: June 4, 2021 at 5:00 p.m. (Atlantic Standard Time).

Responses:

A. Opposition of the Oversight Board, AAFAF, and PREPA to Cobra Acquisitions LLC's Motion to Lift the Stay Order [Case No. 17-3283, ECF No. 16889; Case No. 17-4780, ECF No. 2507]

Reply, Joinder & Statement Deadlines: June 8, 2021 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and June 9, 2021 at 4:00 p.m. (Atlantic Standard Time) for the Debtors and Statutory Committees.

Replies, Joinders & Statements:

A. Cobra Acquisitions LLC's Reply in Support of Motion to Lift the Stay Order [Case No. 17-3283, ECF No. 16902]

- A. Cobra Acquisitions LLC's Motion for Allowance and Payment of Administrative Expense Claims [Case No. 17-3283, ECF No. 8789]
- B. Order Granting Joint Urgent Motion of the Oversight Board, PREPA, and AAFAF to Extend All Applicable Deadlines to Cobra Acquisition LLC's Motion for Allowance and Payment of Administrative Expense Claims [Case No. 17-3283, ECF No. 8886; Case No. 17-4780, ECF No. 1670]
- C. Joint Informative Motion Pursuant to Order of October 17, 2019 Regarding Cobra-Acquisition LLC's Motion for Allowance and Payment of Administrative Expense Claims [Case No. 17-3283, ECF No. 10307]
- D. Joint Status Report Pursuant to February 3, 2020 Order Scheduling Further Status Conference in Connection with Cobra Acquisition LLC's Motion for Allowance and Payment of Administrative Expense Claims [Case No. 17-3283, ECF No. 13253; Case No. 17-4780, ECF No. 2011]

- E.—Status Report Pursuant to June 5, 2020 Order Regarding Cobra Acquisition LLC's Motion for Allowance and Payment of Administrative Expense Claims [Case No. 17-3283, ECF No. 15308; Case No. 17-4780, ECF No. 2314]
- F.—Joint Motion of Government Parties and Cobra Acquisitions LLC to Adjourn Cobra Acquisitions LLC's Motion to Lift the Stay Order [Case No. 17-3283, ECF No. 16405; Case No. 17-4780, ECF No. 2443]
- G. Order Granting Joint Motion of Government Parties and Cobra Acquisitions LLC to Adjourn Cobra Acquisitions LLC's Motion to Lift the Stay Order [Case No. 17-3283, ECF No. 16410; Case No. 17-4780, ECF No. 2445]
- H. Urgent Consensual Motion for Extension of Deadlines [Case No. 17-3283, ECF No. 16842; Case No. 17-4780, ECF No. 2500]
- I. Order Granting Urgent Consensual Motion for Extension of Deadlines [Case No. 17-3283, ECF No. 16853; Case No. 17-4780, ECF No. 2501]
- J. Status Report Pursuant to December 9, 2020 Order Setting Deadline for Further Status Report Regarding Cobra Acquisition LLC's Motion for Allowance and Payment of Administrative Expense Claims [Case No. 17-3283, ECF No. 16893; Case No. 17-4780, ECF No. 2509]

Status: This matter is going forward.

Estimated Time Required: 14 minutes.

<u>Order and Number of Speakers</u>: The names of counsel who intend to speak on this matter and time allocations for each party are listed below, in the order in which the parties shall present argument:

- A.-Movants:
 - 1.—Cobra: Abid Qureshi, 5 minutes
- B. Objecting Parties:
 - 1.—FOMB: Scott P. Cooper, 5 minutes
 - 2.—AAFAF: Elizabeth McKeen, 2 minutes
- C.—Movants:
 - 1.—Cobra: Abid Qureshi, 2 minutes
- 1. 2. Debtor's Motion to Dismiss Counts I and II of Plaintiffs' Second Amended Complaint. Defendant Puerto Rico Electric Power Authority's Memorandum of Law in Support of Motion to Dismiss Counts I and II of Plaintiffs' Second Amended Complaint Pursuant to Fed. R. Civ. P. 12(b)(1) and (6) [Adv. Case No. 20-115, ECF No. 41]

<u>Description</u>: PREPA's motion to dismiss Counts I and II of the Second Amended Complaint filed by Plaintiffs Anne Catesby Jones and Jorge Valdes Llauger.

Objection Deadline: April 27, 2021.

Responses:

A. Opposition to the Defendant's Motion to Dismiss Amended Complaint for (I) Declaratory Judgment and (II) Relief from the Automatic Stay [Adv. Case No. 20-115, ECF No. 44]

Reply, Joinder & Statement Deadlines: May 25, 2021.

Replies, Joinders & Statements:

- A. Joinder of Intervenor Committee in Motion of Oversight Board to Dismiss the Plaintiffs' Second Amended Complaint [Adv. Case No. 20-115, ECF No. 43]
- B. Reply in Support of Defendant Puerto Rico Electric Power Authority's Motion to Dismiss Counts I and II of Plaintiffs' Second Amended Complaint Pursuant to Fed. R. Civ. P. 12(b)(1) and (6) [Adv. Case No. 20-115, ECF No. 48]
- C. Joinder of Intervenor Committee in the Reply of the Oversight Board in Support of Motion to Dismiss [Adv. Case No. 20-115, ECF No. 49]

Related Documents:

- A. Second Amended Complaint for (I) Declaratory Judgment and (II) Relief from the Automatic Stay [Adv. Case No. 20-115, ECF No. 36]
- B. Unopposed Urgent Motion of Defendant Puerto Rico Electric Power Authority, by and through the Financial Oversight and Management Board for Puerto Rico, for an Order Amending the Current Schedule for Responding to Plaintiffs' Second Amended Complaint and Briefing Any Motion to Dismiss [Adv. Case No. 20-115, ECF No. 38]
- C. Order Amending Briefing Schedule [Adv. Case No. 20-115, ECF No. 39]

Status: This matter is going forward.

Estimated Time Required: 50 minutes.

<u>Order and Number of Speakers</u>: The names of counsel who intend to speak on this matter and time allocations for each party are listed below, in the order in which the parties shall present argument:

- A. Movants:
 - 1. **PREPA**: Lary A. Rappaport, 15 minutes
 - 2. UCC: John Arrastia, 5 minutes
- B. Objecting Parties:
 - 1. Plaintiffs: Mark Vazquez, 25 minutes
- C. Movants:
 - 1. **PREPA**: Lary A. Rappaport, 5 minutes

III. ADJOURNED MATTERS

1. Objection of Puerto Rico Sales Tax Financing Corporation to Proofs of Claim of the United States Department of the Treasury/Internal Revenue Service. Objection of Puerto Rico Sales Tax Financing Corporation to Proofs of Claim of the United States Department of the Treasury/Internal Revenue Service (Claims Nos. 168648 and 16885) [Case No. 17-3283, ECF No. 7419, Case No. 17-3284, ECF No. 643]

<u>Description</u>: AAFAF, on behalf of itself and the Puerto Rico Sales Tax Financing Corporation ("<u>COFINA</u>"), objects to proofs of claim filed by the United States Department of the Treasury/Internal Revenue Service (Claims No. 168648 and 16885) against COFINA.

Objection Deadline: October 25, 2019 at 4:00 p.m. (Atlantic Standard Time).

Responses:

A. United States' Response to COFINA's Objection to the Internal Revenue Service's Proofs of Claim [Case No. 17-3283, ECF No. 8993, Case No. 17-3284, ECF No. 686]

Reply, Joinder & Statement Deadlines: December 24, 2019 at 4:00 p.m. (Atlantic Standard Time).

Replies, Joinders & Statements:

A. COFINA's Reply to the United States' Response to COFINA's Objection to the Internal Revenue Service's Proofs of Claim [ECF No. 8993] [Case No. 17-3283, ECF No. 9649, Case No. 17-3284, ECF No. 693]

- A. Stipulation and Agreed Order (A) Withdrawing Proofs of Claim of the United States Department of the Treasury/Internal Revenue Service (Claim Nos. 168648 and 168885); (B) Deeming Previously Filed Objection to Apply to Amended IRS Proof of Claim (Claim No. 169423); (C) Extending Deadline to Respond to the Objection; and (D) Adjourning Hearing to Consider the Objection [Case No. 17-3283, ECF No. 7927, Case No. 17-3284, ECF No. 662]
- B. Stipulation and Agreed Order (A) Extending Deadline to Respond to AAFAF's Objection to the Proof of Claim of the United States Department of the Treasury/Internal Revenue Service (Claim Nos. 169423); and (B) Adjourning Hearing to Consider the Objection [Case No. 17-3283, ECF No. 8466, Case No. 17-3284, ECF No. 666]
- C. Stipulation and Agreed Order (A) Further Extending Deadline to Respond to AAFAF's Objection to the Proof of Claim of the United States Department of the Treasury/Internal Revenue Service (Claim No. 169423); and (B) Further Adjourning Hearing to Consider the Objection [Case No. 17-3283, ECF No. 8688, Case No. 17-3284, ECF No. 678]

- D. Informative Motion Regarding Extension of United States' Deadline to Respond to Claim Objection [Case No. 17-3283, ECF No. 8839, Case No. 17-3284, ECF No. 684]
- E. Informative Motion Regarding Extension of COFINA's Deadline to Reply to United States' Response to Claim Objection [Case No. 17-3283, ECF No. 9330, Case No. 17-3284, ECF No. 688]
- F. Informative Motion Regarding Adjournment of Hearing on COFINA's Objection to the Internal Revenue Service's Proofs of Claims [ECF No. 7419] [Case No. 17-3283, ECF No. 10021, Case No. 17-3284, ECF No. 695]
- G. Informative Motion Regarding Adjournment of Hearing on COFINA's Objection to the Internal Revenue Service's Proofs of Claims [ECF No. 7419] [Case No. 17-3283, ECF No. 12550, Case No. 17-3284, ECF No. 702]
- H. Informative Motion Regarding Adjournment of Hearing on COFINA's Objection to the Internal Revenue Service's Proofs of Claims [ECF No. 7419] [Case No. 17-3283, ECF No. 13122, Case No. 17-3284, ECF No. 709]
- I. Informative Motion Regarding Adjournment of Hearing on COFINA's Objection to the Internal Revenue Service's Proofs of Claims [ECF No. 7419] [Case No. 17-3283, ECF No. 13589, Case No. 17-3284, ECF No. 712]
- J. Informative Motion Regarding Adjournment of Hearing on COFINA's Objection to the Internal Revenue Service's Proofs of Claims [ECF No. 7419] [Case No. 17-3283, ECF No. 14223, Case No. 17-3284, ECF No. 715]
- K. Informative Motion Regarding Adjournment of Hearing on COFINA's Objection to the Internal Revenue Service's Proofs of Claims [ECF No. 7419] [Case No. 17-3283, ECF No. 14768, Case No. 17-3284, ECF No. 719]
- L. Informative Motion Regarding Adjournment of Hearing on COFINA's Objection to the Internal Revenue Service's Proofs of Claims [ECF No. 7419] [Case No. 17-3283, ECF No. 15320, Case No. 17-3284, ECF No. 722]
- M. Informative Motion Regarding Adjournment of Hearing on COFINA's Objection to the Internal Revenue Service's Proofs of Claims [ECF No. 7419] [Case No. 17-3283, ECF No. 15682, Case No. 17-3284, ECF No. 724]
- N. Informative Motion Regarding Adjournment of Hearing on COFINA's Objection to the Internal Revenue Service's Proofs of Claims [ECF No. 7419] [Case No. 17-3283, ECF No. 15927, Case No. 17-3284, ECF No. 735]
- O. Informative Motion Regarding Adjournment of Hearing on COFINA's Objection to the Internal Revenue Service's Proofs of Claims [ECF No. 7419] [Case No. 17-3283, ECF No. 16574, Case No. 17-3284, ECF No. 743]

P. Informative Motion Regarding Adjournment of Hearing on COFINA's Objection to the Internal Revenue Service's Proofs of Claims [ECF No. 7419] [Case No. 17-3283, ECF No. 16895, Case No. 17-3284, ECF No. 748]

Status: This matter has been adjourned to August 4, 2021 omnibus hearing.

Estimated Time Required: N/A.

2. Atlantic Medical Center, Inc. et al.'s Motion to Enforce Court's Prior Order and for Relief from Automatic Stay. Motion of Atlantic Medical Center, Inc., Camuy Health Services, Inc., Centro de Salud Familiar Dr. Julio Palmieri Ferri, Inc., Ciales Primary Health Care Services, Inc., Corp. de Serv. Médicos Primarios y Prevención de Hatillo, Inc., Costa Salud, Inc., Centro de Salud de Lares, Inc., Centro de Servicios Primarios de Salud de Patillas, Inc., and Hospital General Castañer, Inc. Seeking (I) Enforcement of the Court's Prior Order and (II) Relief from the Automatic Stay [Case No. 17-3283, ECF No. 12918]

<u>Description</u>: Certain medical centers' motion seeking (a) to compel the Commonwealth to pay certain amounts to the movants, (b) relief from the automatic stay to allow related prepetition litigation to go forward, and (c) prospective enforcement of certain statutory payments by the Commonwealth.

Objection Deadline: February 24, 2021 at 5:00 p.m. (Atlantic Standard Time).

Responses:

A. Opposition of the Financial Oversight and Management Board of Puerto Rico to Motion of Atlantic Medical Center, Inc., Camuy Health Services, Inc., Centro de Salud Familiar Dr. Julio Palmieri Ferri, Inc., Ciales Primary Health Care Services, Inc., Corp. de Serv. Médicos Primarios y Prevención de Hatillo, Inc., Costa Salud, Inc., Centro de Salud de Lares, Inc., Centro de Servicios Primarios de Salud de Patillas, Inc., and Hospital General Castañer, Inc. Seeking (I) Enforcement of the Court's Prior Order and (II) Relief from the Automatic Stay [Case No 17-3283, ECF No. 15883]

Reply, Joinder & Statement Deadlines: March 3, 2021 at 5:00 p.m. (Atlantic Standard Time).

Replies, Joinders & Statements:

- A. Official Committee of Unsecured Creditors' Statement in Partial Support of Motion of Atlantic Medical Center, Inc. and Other Health Service Providers for (I) Enforcement of Court's Prior Order and (II) Relief from Automatic Stay [Case No. 17-3283, ECF No. 13260]
- B. Reply of Atlantic Medical Center, Inc., Camuy Health Services, Inc., Centro de Salud Familiar Dr. Julio Palmieri Ferri, Inc., Ciales Primary Health Care Services, Inc., Corp. de Serv. Médicos Primarios y Prevención de Hatillo, Inc., Costa Salud, Inc., Centro de Salud de Lares, Inc., Centro de Servicios Primarios de Salud de

Patillas, Inc., and Hospital General Castañer, Inc. in Further Support of Motion to (I) Enforce the Court's Prior Order and (II) Obtain Relief from the Automatic Stay [Case No 17-3283, ECF No. 15910]

Related Documents:

- A. Joint Stipulation and Order Regarding Atlantic Medical Center, Inc., et al.'s Motion for Relief from the Automatic Stay (ECF No. 12918) [Case No. 17-3283, ECF No. 13279]
- B. Joint Stipulation and Order Regarding Atlantic Medical Center, Inc., et al.'s Motion for Relief from the Automatic Stay (ECF No. 12918) [Case No. 17-3283, ECF No. 13303]
- C. Urgent Consented Motion for Extension of Deadlines [Case No. 17-3283, ECF No. 14166]
- D. Order Granting Urgent Consented Motion for Extension of Deadlines [Case No. 17-3283, ECF No. 14172]
- E. Urgent Consensual Motion for Extension of Deadlines [Case No. 17-3283, ECF No. 14575]
- F. Order Granting Urgent Consented Motion for Extension of Deadlines [Case No. 17-3283, ECF No. 14581]
- G. Urgent Consensual Motion for Extension of Deadlines [Case No. 17-3283, ECF No. 15237]
- H. Order Granting Urgent Consented Motion for Extension of Deadlines [Case No. 17-3283, ECF No. 15270]
- I. Urgent Consensual Motion for Extension of Deadlines [Case No. 17-3283, ECF No. 15599]
- J. Order Granting Urgent Consented Motion for Extension of Deadlines [Case No. 17-3283, ECF No. 15608]
- K. Order Adjourning Motion of Atlantic Medical Center, Inc., Camuy Health Services, Inc., Centro de Salud Familiar Dr. Julio Palmieri Ferri, Inc., Ciales Primary Health Care Services, Inc., Corp. de Serv. Médicos Primarios y Prevención de Hatillo, Inc., Costa Salud, Inc., Centro de Salud de Lares, Inc., Centro de Servicios Primarios de Salud de Patillas, Inc., and Hospital General Castañer, Inc. Seeking (I) Enforcement of the Court's Prior Order and (II) Relief from the Automatic Stay [Case No 17-3283, ECF No. 16002]

<u>Status</u>: Upon agreement of the parties and notice to the Court, this matter has been adjourned to August 4, 2021 omnibus hearing.

Estimated Time Required: N/A.

3. DRA Parties' Amended Motion for Adequate Protection or Relief from the Automatic Stay. The DRA Parties' Amended Motion and Memorandum of Law in Support of Their Request for Adequate Protection or Relief from the Automatic Stay [Case No. 17-3283, ECF No. 16276; Case No. 17-3567, ECF No. 998]

<u>Description</u>: Motion of the DRA Parties for entry of an order mandating the Debtors to provide adequate protection of the DRA Parties' interest in the DRA collateral, or, in the alternative, allowing the DRA Parties relief from the automatic stay so that they could seek other legal remedies (solely concerning the Standing Issue).

Government Parties' Objection Deadline: April 21, 2021 (on an individual or joint basis).

Responses:

A. The Government Parties Objection to the DRA Parties' Standing to Seek Relief from the Automatic Stay or in the Alternative, Ordering Payment of Adequate Protection [Case No. 17-3283, ECF No. 16518; Case No. 17-3567, ECF No. 1009]

DRA Response Deadline: May 19, 2021.

Responses:

A. The DRA Parties' Response to the Government Parties Objection to the DRA Parties' Standing to Seek Relief from the Automatic Stay or in the Alternative, Ordering Payment of Adequate Protection [Case No. 17-3283, ECF No. 16780; Case No. 17-3567, ECF No. 1021]

Government Parties Reply Deadline: July 21, 2021 (on an individual or joint basis).

Replies:

A. None.

- A. Order Approving Joint Stipulation of the Government Parties and the DRA Parties Regarding the DRA Parties' Motion and Memorandum of Law in Support of their Motion for Relief from the Automatic Stay, or in the Alternative, Ordering Payment of Adequate Protection [Case No. 17-3283, ECF No. 14417; Case No. 17-3567, ECF No. 931]
- B. Reservation of Rights of Assured Guaranty Corp., Assured Guaranty Municipal Corp., and National Public Finance Guarantee Corporation, in Their Capacity as HTA Bondholders, with Respect to the DRA Parties' Amended Motion and Memorandum of Law in Support of Their Request for Adequate Protection or Relief from the Automatic Stay (ECF No. 16276) [Case No. 17-3283, ECF No. 16505; Case No. 17-3567, ECF No. 1007]

- C. Reservation of Rights of Ambac Assurance Corporation and Financial Guaranty Insurance Corporation to the DRA Parties' Amended Motion and Memorandum of Law in Support of Their Request for Adequate Protection or Relief from the Automatic Stay [Case No. 17-3283, ECF No. 16509; Case No. 17-3567, ECF No. 1008]
- D. Joinder of Official Committee of Unsecured Creditors in Support of Government Parties' Objection to DRA Parties' Standing to Seek Relief from Automatic Stay or in Alternative, Ordering Payment of Adequate Protection [Case No. 17-3283, ECF No. 16519; Case No. 17-3567, ECF No. 1010]
- E. Urgent Joint Motion of the Government Parties and the DRA Parties for Modification of Certain Deadlines in the Order Approving Joint Stipulation of the Government Parties and the DRA Parties Regarding the DRA Parties' Motion and Memorandum of Law in Support of Their Motion for Relief from the Automatic Stay, or in the Alternative, Ordering Payment of Adequate Protection [Case No. 17-3283, ECF No. 16683; Case No. 17-3567, ECF No. 1013]
- F. Order Approving Urgent Motion Modifying Order on Joint Stipulation of the Government Parties and the DRA Parties Regarding the DRA Parties' Motion and Memorandum of Law In Support of Their Motion for Relief from the Automatic Stay, or in the Alternative, Ordering Payment of Adequate Protection [Case No. 17-3283, ECF No. 16698; Case No. 17-3567, ECF No. 1014]
- G. Second Urgent Joint Motion of the Government Parties and the DRA Parties for Modification of Certain Deadlines in the Order Approving Joint Stipulation of the Government Parties and the DRA Parties Regarding the DRA Parties' Motion and Memorandum of Law in Support of Their Motion for Relief from the Automatic Stay, or in the Alternative, Ordering Payment of Adequate Protection [Case No. 17-3283, ECF No. 16864; Case No. 17-3567, ECF No. 1027]
- H. Order Approving Second Urgent Motion Modifying Order on Joint Stipulation of the Government Parties and the DRA Parties Regarding the DRA Parties' Motion ad Memorandum of Law in Support of Their Motion for Relief from the Automatic Stay, or in the Alternative, Ordering Payment of Adequate Protection [Case No. 17-3283, ECF No. 16866; Case No. 17-3567, ECF No. 1029]

Status: This matter has been adjourned to August 4, 2021 omnibus hearing.

Estimated Time Required: N/A.

4. Cobra Acquisitions LLC's Motion to Lift Stay Order. Cobra Acquisitions LLC's Motion to Lift the Stay Order [Case No. 17-3283, ECF No. 16328; Case No. 17-4780, ECF No. 2428]

Description: Motion of Cobra Acquisitions LLC for entry of an order lifting stay applicable to Cobra's Motion for Allowance and Payment of Administrative Expense Claims.

Objection Deadline: June 4, 2021 at 5:00 p.m. (Atlantic Standard Time).

Responses:

A. Opposition of the Oversight Board, AAFAF, and PREPA to Cobra Acquisitions LLC's Motion to Lift the Stay Order [Case No. 17-3283, ECF No. 16889; Case No. 17-4780, ECF No. 2507]

Reply, Joinder & Statement Deadlines: June 8, 2021 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and June 9, 2021 at 4:00 p.m. (Atlantic Standard Time) for the Debtors and Statutory Committees.

Replies, Joinders & Statements:

A. Cobra Acquisitions LLC's Reply in Support of Motion to Lift the Stay Order [Case No. 17-3283, ECF No. 16902]

- A. Cobra Acquisitions LLC's Motion for Allowance and Payment of Administrative Expense Claims [Case No. 17-3283, ECF No. 8789]
- B. Order Granting Joint Urgent Motion of the Oversight Board, PREPA, and AAFAF to Extend All Applicable Deadlines to Cobra Acquisition LLC's Motion for Allowance and Payment of Administrative Expense Claims [Case No. 17-3283, ECF No. 8886; Case No. 17-4780, ECF No. 1670]
- C. Joint Informative Motion Pursuant to Order of October 17, 2019 Regarding Cobra Acquisition LLC's Motion for Allowance and Payment of Administrative Expense Claims [Case No. 17-3283, ECF No. 10307]
- D. Joint Status Report Pursuant to February 3, 2020 Order Scheduling Further Status Conference in Connection with Cobra Acquisition LLC's Motion for Allowance and Payment of Administrative Expense Claims [Case No. 17-3283, ECF No. 13253; Case No. 17-4780, ECF No. 2011]
- E. Status Report Pursuant to June 5, 2020 Order Regarding Cobra Acquisition LLC's Motion for Allowance and Payment of Administrative Expense Claims [Case No. 17-3283, ECF No. 15308; Case No. 17-4780, ECF No. 2314]
- <u>F.</u> Joint Motion of Government Parties and Cobra Acquisitions LLC to Adjourn Cobra Acquisitions LLC's Motion to Lift the Stay Order [Case No. 17-3283, ECF No. 16405; Case No. 17-4780, ECF No. 2443]

- G. Order Granting Joint Motion of Government Parties and Cobra Acquisitions LLC to Adjourn Cobra Acquisitions LLC's Motion to Lift the Stay Order [Case No. 17-3283, ECF No. 16410; Case No. 17-4780, ECF No. 2445]
- H. Urgent Consensual Motion for Extension of Deadlines [Case No. 17-3283, ECF No. 16842; Case No. 17-4780, ECF No. 2500]
- <u>I.</u> Order Granting Urgent Consensual Motion for Extension of Deadlines [Case No. 17-3283, ECF No. 16853; Case No. 17-4780, ECF No. 2501]
- L Status Report Pursuant to December 9, 2020 Order Setting Deadline for Further Status Report Regarding Cobra Acquisition LLC's Motion for Allowance and Payment of Administrative Expense Claims [Case No. 17-3283, ECF No. 16893; Case No. 17-4780, ECF No. 2509]
- K. Order Adjourning Cobra Acquisitions LLC's Motion to Lift Stay Order [Case No. 17-3283, ECF No. 16970; Case No. 17-4780, ECF No. 2520]

Status: This matter has been adjourned to August 4, 2021 omnibus hearing.

Estimated Time Required: N/A.

5. 4. Motion of Fir Tree Capital Management, LP for Allowance and Payment of Administrative Expense Claim. Motion of Fir Tree Capital Management, LP for Allowance and Payment of Administrative Expense Claim [Case No. 17-3283, ECF No. 16331]

<u>Description</u>: Motion of Fir Tree Capital Management, LP for entry of an order allowing and directing payment of its administrative expense claim against the Commonwealth of Puerto Rico.

Objection Deadline: July 20, 2021 at 4:00 p.m. (Atlantic Standard Time).

Responses:

A. None.

Reply, Joinder & Statement Deadlines: July 27, 2021 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and July 28, 2021 at 4:00 p.m. (Atlantic Standard Time) for the Debtors and Statutory Committees.

Replies, Joinders & Statements:

A. None.

Related Documents:

A. None.

<u>Status</u>: Upon agreement of the parties and notice to the Court, this matter has been adjourned to August 4, 2021 omnibus hearing.

Estimated Time Required: N/A.

<u>6.</u> 5-Debtors' Omnibus Objections to Claims.

Related Documents:

- A. Order Regarding Pending Omnibus Objections to Claims [Case No. 17-3283, ECF No. 14419]
- B. Order Regarding Adjourned Omnibus Objections to Claims [Case No. 17-3283, ECF No. 15437]
- C. Notice of Adjournment of Omnibus Objections Scheduled for Hearing at the June 16, 2021 Omnibus Hearing to the August 4, 2021 Omnibus Hearing [Case No. 17-3283, ECF No. 16935]

The following omnibus objections to claims were scheduled for hearing at the June 16, 2021 omnibus hearing but will be subject to forthcoming notices of presentment for final written orders of the Court.

Three Hundred Thirteenth [ECF No. 16642]; Three Hundred Fifteenth [ECF No. 16656]; Three Hundred Seventeenth [ECF No. 16640]; Three Hundred Eighteenth [ECF No. 16644]; Three Hundred Nineteenth [ECF No. 16645]; Three Hundred Twentieth [ECF No. 16646]; Three Hundred Twenty Second [ECF No. 16648]; Three Hundred Twenty Third [ECF No. 16649]; Three Hundred Twenty Fourth [ECF No. 16650]; Three Hundred Twenty Fifth [ECF No. 16651]; Three Hundred Twenty Sixth [ECF No. 16652]; Three Hundred Twenty Seventh [ECF No. 16653]; Three Hundred Twenty Ninth [ECF No. 16655]; Three Hundred Thirtieth [ECF No. 16658]; Three Hundred Thirty First [ECF No. 16659]; Three Hundred Thirty Second [ECF No. 16657]; and Three Hundred Thirty Third [ECF No. 16660].

The following omnibus objections to claims have been adjourned to the August 4, 2021 omnibus hearing.

Two Hundred Eighty-Eighth [ECF No. 15703]; Two Hundred Ninety-Fifth [ECF No. 15718]; Three Hundred First [ECF No. 16021]; Three Hundred Third [ECF No. 16030]; Three Hundred Fifth [ECF No. 16023]; Three Hundred Ninth [ECF No. 16027]; Three Hundred Twelfth [ECF No. 16641]; Three Hundred Fourteenth [ECF No. 16638]; Three Hundred Sixteenth [ECF No. 16643]; and Three Hundred Twenty First [ECF No. 16647].

The following omnibus objection to claims has been adjourned, solely with respect to claims that have not already been disallowed by entry of a final written order of the Court.

Two Hundred Thirty-Fourth [ECF No. 13918].

Status: This matter has been adjourned.

Estimated Time Required: N/A.

Dated: June 14,15, 2021

San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock

Martin J. Bienenstock

Brian S. Rosen

Paul V. Possinger

Ehud Barak

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Exhibit A

Order Regarding Procedures for June 16–17, 2021 Omnibus Hearing

Exhibit B

Agenda Redline

Document comparison by Workshare 9.5 on Tuesday, June 15, 2021 12:56:52 PM

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Moved cell	
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Padding cell	

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Format changed	0	
Total changes	96	

Case:17-03283-LTS Doc#:16992-2 Filed:06/15/21 Entered:06/15/21 15:16:55 Desc: Exhibit B Page 19 of 19